

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10581 NMG

YVETTE LOCKHART-BEMBERY,)
Plaintiff)
VS.)
)
TOWN OF WAYLAND POLICE DEPARTMENT,)
ROBERT IRVING, in his capacity as CHIEF OF THE)
WAYLAND POLICE DEPARTMENT and)
DANIEL SAURO)
Defendants)

JOINT MOTION FOR EXTENSION OF TIME

The Plaintiff and Defendants hereby ask this Court to extend the time within which to complete discovery to include up and through March 31, 2005. In support thereof, counsel representing the above-named parties represent that they have several trials scheduled during the next couple of months and have attempted in good faith to schedule depositions and other discovery matters. A very short discovery period had originally been set for this case and the parties are now seeking additional time to reasonably allow them to conduct appropriate discovery. The parties state that they have not requested any previous enlargement of time in this matter.

Respectfully Submitted,

The Plaintiff,
Yvette Lockhart-Bembery,
By Her Attorney,

The Defendants,
Town of Wayland Police Department,
Robert Irving, in his capacity as
Chief of the Wayland Police
Department and Daniel Sauro,
By their attorneys,

/s/ Jason Fischer
Jason Fischer, BBO#
JASON & FISCHER
47 Winter Street
Boston, MA 02108
(617) 423-7904

/s/ Jeremy I. Silverfine
Jeremy Silverfine, BBO #542779
Leonard H. Kesten, BBO #542042
Brody, Hardoon, Perkins & Kesten, LLP
One Exeter Plaza
Boston, MA 02116
(617) 880-7100

Date: 10-14-04